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POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

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REVISION TO LIBRARY REFERENCE RULE

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
DOCKET NO. RM98-2

DAVID B. POPKIN COMMENTS IN RESPONSE TO ORDER NO. 1263 ON FURTHER
PROPOSED REVISIONS TO LIBRARY REFERENCE PRACTICE [THIRD SET]

I would like to file comments on the proposed Commission Rule from the perspective of an individual participant located at some distance from Washington DC and who has participated in various Commission cases over the past ten or so years.

There are two main concerns that I have with the availability of Library References. The first is the ability to determine just what a Library Reference contains. This is necessary to enable me to establish whether I have any interest in the material to further my understanding and participation in the case. If a party is going to be able to save serving the material on some 140 participants in the case, they should be required to spend a few minutes writing up a meaningful explanation on what the reference contains so that a participant can determine whether or not it would be appropriate to obtain or look at the reference. Being some 200-plus miles from Washington DC makes it difficult to just stop by and take a look at them. I am confused by the apparent difference between the mandatory data provided by subsection [iv] and the optional provisions of subsection [vi].

Furthermore, this explanation of the Library Reference should be available on the Commission's website so that participants will have easy and quick access to the material.

The second concern that I have is that I will not have to file a motion to obtain access to a Library Reference. This would cause added expense and work for me as well as the added work for the Commission and the reference filer along with the delays that would be incurred. As an individual participant, I must watch my costs so as to obtain the most "bang for the buck" in my participation. The term "special requests" in subsection [ix] is not clear as to whether the motion would be required to just obtain a reference on an occasional basis.

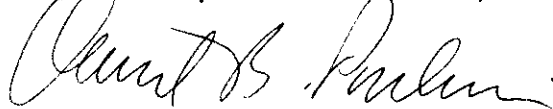
Subsection [ii][D] is not clear and should be divided into two parts, those items that are directly associated with the interrogatory question and those supporting data or information. The first category should be automatically furnished to the proponent of the interrogatory while the second would be like any other reference.

In a previous case, the Postal Service responded to one of my interrogatories by creating a library reference containing their responses to my questions and then their response to my interrogatory was just, See Library Reference XXXX. The rules should clearly indicate that this type of response must be served on the interrogatory proponent simultaneously with the rest of the responses.

The three-day service requirement contained in subsection [ii][A] should also apply to subpart [D] as a minimum.

These changes are required to allow individual intervenors, as well as all intervenors, to participate effectively, both in time and money, in the Commission's proceedings.

David B. Popkin October 16, 1999

A handwritten signature in cursive script, appearing to read "David B. Popkin", written in black ink.